

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: 5-2-2008

From: Shlomo Rosenfeld
Name (Print or type)

Shlomo I. Rosenfeld & Associates
Agency, jurisdiction, chapter, company, association, individual, etc.

1763 Broadway Oakland CA 94612
Street City State Zip

I/We ☐ (do) ☒ (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 315.1.2 Exception (2) 2007 CMC
and request that this section or reference provision be recommended:

☐ Approved ☒ Disapproved ☐ Held for Further Study ☒ Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Do not delete the words "controlled by the same thermostat"

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The public interest requires that it will be feasible to design and enforce the proposed regulations. This is a public (patient and medical staff) health issue as well.

The words "controlled by the same thermostat" were specifically added to this section in past CMC upgrade. CMC Table 315 specifies temperature ranges. It is impossible to control the the same humidity level with one humidifier serving several rooms in which the temperature is controlled by different thermostats when each thermostat is set to a different temperature.

The importance of the relationship of the room temperature and the room relative humidity is addressed in the 2003 ASHRAE Application Handbook Chapter 7-Health Care Facilities note 'n' to Table 3 stating: "Relative humidity ranges listed are minimum and maximum limits where control is specifically needed. These limits are not intended to be independent of the space temperature. For example, relative humidity is expected to be at the higher end of the range when the temperature is also at the higher end and vice versa."

If the humidistat controlling the humidifier is located in the room with the higher temperature the humidity in the room at the lower temperature will be too high (possibly out of the range of table 315) when both rooms are served by a single humidifier. If the humidistat controlling the humidifier is located in the room with the lower temperature

the humidity in the room at the higher temperature will be too low (possibly out of the range of table 315) when both rooms are served by a single humidifier. Before the words "controlled by the same thermostat" were added to this section of CMC, it contributed to design errors without a solid enforcement possibility to correct such design errors.

In addition, when a single humidifier is serving several rooms controlled by different thermostats, the humidifier is installed upstream of the terminal CV units and upstream of the re-heat coils serving each of these rooms.

Installing the humidifier in the cold supply air upstream of the re-heat coils does not allow to add humidity to the supply air since the air is cold and near saturation. Air saturated in moisture traveling through the cold terminal CV units could result in condensation at sharp corners, turns and dampers inside the terminal CV unit.

Condensation in the supply air terminal CV units, which are downstream of the final filter of the sensitive areas listed in Table 315, is a potential for mold growth and a public (patient and medical staff) health concern.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.